

UNITED STATES DISTRICT COURT - DISTRICT OF NEW HAMPSHIRE

ANDRE BISASOR, Plaintiff,

v.

CRAIG S. DONAIS; RUSSELL F. HILLIARD; DONAIS LAW OFFICES, PLLC;

UPTON & HATFIELD, LLP; and MARY K. DONAIS, Defendants.

Case No.1:23-cv-00374-JL

**PLAINTIFF'S EMERGENCY MOTION TO EXTEND TIME TO FILE RESPONSE/OBJECTION TO CRAIG DONAIS, MARY DONAIS AND DONAIS LAW OFFICES PLLC'S MOTION FOR LEAVE OF COURT TO REVIEW SEALED DOCUMENTS PURSUANT TO L.R. 83.12(B)(2)**

1. I hereby move the court to allow an extension of time to file a response/objection to **DEFENDANTS CRAIG S. DONAIS, MARY K. DONAIS AND DONAIS LAW OFFICES PLLC'S MOTION FOR LEAVE OF COURT TO REVIEW SEALED DOCUMENTS PURSUANT TO L.R. 83.12(B)(2)** (hereinafter "motion for leave to review sealed documents"). Grounds are as follows.
2. The motion for leave to review sealed documents implicates significant issues that could or will affect, impair, and/or prejudice my rights. It is critical that I be able to properly and adequately respond/oppose this motion.
3. The motion for leave to review sealed documents is 18 pages in length. For the type of motion that it is, this is a lengthy motion. It also contains sweeping prejudicial statements that I need time to properly address. It also contains false or misleading statements and/or have mischaracterized the procedural history of this case as well as the situation with pending prior cases in state court. I need to be able to refute or show the misleading or bad faith nature of such statements. This requires more time than is allotted under the rules.
4. Moreover, I just did a hefty motion to amend complaint with proposed amended complaint, which took up essentially all of my time. I am exhausted from that. I have had no time to properly or adequately work on the response/opposition to the motion for leave to review sealed documents.
5. I thus need time to address this motion for leave to review sealed documents. It requires proper treatment.
6. I therefore need an extension. I request an extension until **April 17, 2024**. In addition to the above-stated grounds, I am requesting extension to this date because of a few additional reasons.
7. The motion to amend complaint that I just filed recently will likely generate motion practice from the defendants during or over the next few weeks. This will likely include oppositions, replies and sur-replies, etc. The April 17, 2024 date will presumably allow some time for that to play out and allow me a chance to address such motion practice without having to also focus on addressing the defendants motion for leave to review sealed documents at the same time, or having to address any replies that may be generated from my response/opposition to that motion for leave, at the same time.
8. Also, I have other court deadlines in other courts that are coming up during or over the next few weeks. This extension would allow me not to be spread thin with competing obligations in other courts, which is a reasonable point given that courts routinely give consideration to this for lawyers in general.
9. Given the nature of the issue, there is no pressing need for this motion for leave to review sealed documents to be resolved urgently. Similarly, the defendants have already reviewed a recently unsealed document (i.e., a motion to seal a motion for reconsideration I last filed at the beginning of March, was unsealed by the court), which effectively resulted in at least a partial allowance regarding the type of relief the defendants was seeking.
10. I ask that this emergency motion to extend time be ruled upon as soon as possible (by today) given that the deadline expires after today. I assume that this can be ruled upon quickly under the circumstances and that an order can be generated today before the close of court today.
11. WHEREFORE, I respectfully request that this Court grants the relief requested or grant any other relief the Court deems proper.

March 14, 2024

Respectfully submitted,

/s/Andre Bisasor

Plaintiff Andre Bisasor

**CERTIFICATE OF SERVICE**

This filing is served to all parties of record via the e-filing system.

/s/Andre Bisasor

Andre Bisasor